

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**REQUEST FOR HEARING ON
GOOGLE LLC'S EMERGENCY MOTION FOR ENLARGEMENT OF
THE PAGE LIMITS FOR SUMMARY JUDGMENT BRIEFING**

Defendant Google LLC (“Google”) has filed an *emergency motion* pursuant to Local Civil Rules 7(F)(3) and 56(B) for an order enlarging the page limits for summary judgment briefing as follows: 45 pages for opening briefs, 45 pages for opposition briefs, and 35 pages for replies. The opening summary judgment briefs are due **April 26, 2024**, and the time-period between now and then does not permit full briefing and oral argument even on the Court’s one-week motion schedule.

If the Court deems it advisable, Google respectfully requests that the Court set a date and time for (1) Plaintiffs to respond to this motion should they choose to do so (Google waives a written reply), and (2) oral argument (in person or telephonically). Google submits that requiring the response to be filed by 9:00 a.m. on Friday, April 19, 2024, and holding the hearing as soon as practicable thereafter will be both efficient and fair.

Plaintiffs had advanced notice of Google’s motion to enlarge the page limits for summary judgment briefing. Google met and conferred with Plaintiffs by videoconference on Monday, April 15, 2024, to discuss Google’s motion for a page enlargement. Plaintiffs did not provide their position on Google’s requested relief until after 12:00 p.m. on Wednesday, April

17, 2024. Plaintiffs will have had an ample opportunity to consider and prepare their response, should they choose to file one, if it is due on Friday, April 19, 2024.

A proposed order is submitted herewith.

Dated: April 17, 2024

Eric Mahr (*pro hac vice*)
Andrew Ewalt (*pro hac vice*)
Julie Elmer (*pro hac vice*)
Justina Sessions (*pro hac vice*)
Lauren Kaplin (*pro hac vice*)
Jeanette Bayoumi (*pro hac vice*)
Claire Leonard (*pro hac vice*)
Sara Salem (*pro hac vice*)
Tyler Garrett (VSB # 94759)
FRESHFIELDS BRUCKHAUS
DERINGER US LLP
700 13th Street, NW, 10th Floor
Washington, DC 20005
Telephone: (202) 777-4500
Facsimile: (202) 777-4555
eric.mahr@freshfields.com

Daniel Bitton (*pro hac vice*)
AXINN, VELTROP & HARKRIDER LLP
55 2nd Street
San Francisco, CA 94105
Telephone: (415) 490-2000
Facsimile: (415) 490-2001
dbitton@axinn.com

Bradley Justus (VSB # 80533)
David Pearl (*pro hac vice*)
Allison Vissichelli (*pro hac vice*)
AXINN, VELTROP & HARKRIDER LLP
1901 L Street, NW
Washington, DC 20036
Telephone: (202) 912-4700
Facsimile: (202) 912-4701
bjustus@axinn.com

Respectfully submitted,

/s/ Craig C. Reilly
Craig C. Reilly (VSB # 20942)
THE LAW OFFICE OF
CRAIG C. REILLY, ESQ.
209 Madison Street, Suite 501
Alexandria, VA 22314
Telephone: (703) 549-5354
Facsimile: (703) 549-5355
craig.reilly@ccreillylaw.com

Karen L. Dunn (*pro hac vice*)
Jeannie H. Rhee (*pro hac vice*)
William A. Isaacson (*pro hac vice*)
Amy J. Mauser (*pro hac vice*)
Martha L. Goodman (*pro hac vice*)
Bryon P. Becker (VSB #93384)
Erica Spevack (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
2001 K Street, NW
Washington, DC 20006-1047
Telephone: (202) 223-7300
Facsimile (202) 223-7420
kdunn@paulweiss.com

Meredith Dearborn (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (646) 432-5100
Facsimile: (202) 330-5908
mdearnborn@paulweiss.com

Counsel for Google LLC